

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JULIE ELLEN WARTLUFT F/K/A JULIE
ELLEN BARTELS AND FREDERICK L.
BARTELS, JR., Individually and as
Administrators of the Estate of Abrielle Kira
Bartels, Deceased,

Plaintiffs,

vs.

THE MILTON HERSHEY SCHOOL,
and
THE HERSHEY TRUST COMPANY, AS
TRUSTEE OF THE MILTON HERSHEY
SCHOOL TRUST,

Defendants.

C.A. NO.:
1:16-cv-02145-CCC

(CONNER, C.J.)

FILED
HARRISBURG, PA

JUN 22 2018

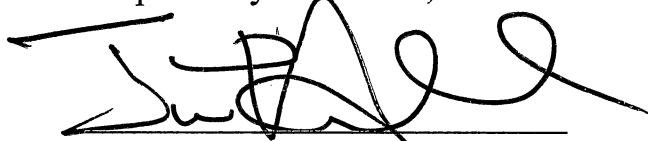
PER _____
DEPUTY CLERK

**DEFENDANTS' MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

Defendants, The Milton Hershey School, and The Hershey Trust Company ("HTC"), as Trustee of the Milton Hershey School Trust (collectively "Defendants"), by and through their undersigned counsel, hereby move under Local Rule 5.8 to file their Memorandum of Law in Support of Motion for Summary Judgment, Statement of Undisputed Facts, and Exhibits in Support thereof under seal. The documents which Defendants seek to file under seal are provided at Exhibit "A" in Defendants' sealed envelope marked "Documents pending sealing decision" provided to the Clerk contemporaneous with the filing of this Motion. Included in that sealed envelope is a Proposed Order granting

Defendants' Motion to Seal and Defendants' Memorandum of Law in Support of Their Motion to Seal. For all the reasons set forth in Defendants' Memorandum of Law in Support of this Motion, which is incorporated herein by reference, this Court should grant Defendants' motion to file the documents under seal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', written over a horizontal line.

Jarad W. Handelman, Esquire

(PA 82629)

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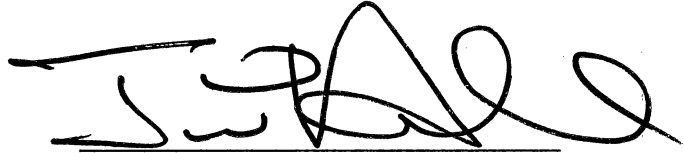
kme@elliottgreenleaf.com

Counsel for Defendants

Date: June 22, 2018

CERTIFICATE OF CONCURRENCE

I, undersigned counsel, certify that counsel for Plaintiffs concurs with the Motion.

A handwritten signature in black ink, appearing to read 'J. Handelman', written over a horizontal line.

Jarad W. Handelman, Esquire

Dated: June 22, 2018

CERTIFICATE OF SERVICE

I, Jarad W. Handelman, Esquire, hereby certify that I caused the foregoing to be served via first class mail and electronic mail upon all counsel of record, including:

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John J. Higson, Esquire
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Counsel for Plaintiffs

A handwritten signature in black ink, appearing to read 'Jarad W. Handelman', written over a horizontal line.

Jarad W. Handelman, Esquire

Dated: June 22, 2018